

Re: GRACE - Plfs' proposed remedial maps

Nicholas Warren <NWarren@aclufl.org>

Tue 6/13/23 7:35 PM

To:George Levesque <George.Levesque@gray-robinson.com>;Jason Unger <jason.unger@gray-robinson.com>;gwysong@miamigov.com <gwysong@miamigov.com>;VMendez@miamigov.com <VMendez@miamigov.com>;jagreco@miamigov.com <jagreco@miamigov.com>;krjones@miamigov.com <krjones@miamigov.com>;klmcnulty@miamigov.com <klmcnulty@miamigov.com>;Christopher N. Johnson <Christopher.Johnson@gray-robinson.com>

Cc:Christopher Merken <christopher.merken@dechert.com>;Carrie McNamara <CMcNamara@aclufl.org>;Neil Steiner <neil.steiner@dechert.com>;Daniel Tilley <dtilley@aclufl.org>

Bcc:Joe Dye <dyework54@gmail.com>;Gilbert Placeres <gplaceres@jd25.law.harvard.edu>

 1 attachments (11 MB)

Plfs' Map 3 (6-13-23).pdf;

Counsel,

Thanks for a productive session today. (And the hospitality!) I'm attaching the "Map 3" our side developed today. It's available on Google Maps [at this link](#). A block assignment file is now in [the previously-shared Drive folder with the other two maps](#).

We appreciate the invitation to speak at tomorrow's commission meeting. Several of my clients will likely want to speak, and I'm happy to answer any questions commissioners may have about the plaintiffs' proposals as well.

Best,

Nick

Nicholas Warren (he/him) | Staff Attorney

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From: Nicholas Warren <NWarren@aclufl.org>

Sent: Monday, June 12, 2023 10:04 AM

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Subject: Re: GRACE - Plfs' proposed remedial maps

Good morning all,

Attached is Dr. Moy's full supplemental report on performance of Black-preferred candidates in plaintiffs' proposed maps 1 and 2. We'd appreciate if you could pass this on to your clients.

Best,

Nick

PLAINTIFFS' TRIAL EXHIBIT

P36

1:22-cv-24066-KMM

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From: Nicholas Warren <NWarren@aclufl.org>
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Subject: Re: GRACE - PIfs' proposed remedial maps

Good evening counsel and Mr. Cantero,

As promised, I'm sending over supplemental information regarding the plaintiffs' proposed maps' compliance with the VRA. Dr. Moy is not yet finished with his report, but I wanted to send this data as soon as possible.

To summarize:

- The analysis finds that Black voters' preferred candidates in a range of recent elections prevail with near-identical vote shares (and sometimes greater vote shares) within the boundaries of plaintiffs' proposed District 5, as compared to the enjoined (current) D5.
- In the six 2022 races studied, the Black-preferred candidate garners from 78–81.4% in plaintiffs' configurations (compared to 77.95–81.9% in the enjoined D5). The runner-up received from 18.6–22%.
- In the five 2020 races studied, the Black-preferred candidate garners from 56.4–82.7% in plaintiffs' configurations (compared to 58.4–84.3% in the enjoined D5). The runner-up received from 17.3–43.6%.

We'd appreciate if you could pass this supplemental info on to your clients. I'll share the full report as soon as it's available (hopefully Monday).

Also, could you let us know if redistricting will be discussed during the special commission meeting Wednesday? More generally over the coming weeks, could you let us know as soon as you know that redistricting will be discussed at a given commission meeting?

Best,
Nick

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From: Nicholas Warren
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Subject: GRACE - Plfs' proposed remedial maps

Good evening/night counsel,

Aached is a letter from the plaintiffs in *GRACE v. City of Miami*, presenting two proposed remedial maps to the City Commission. As the letter notes, they can be viewed on Google Maps at bitly.ws/Fhli. More materials and data files are at aclufl.org/miami-maps. Printed maps are at the end of the letter.

I'd greatly appreciate if you could pass this on to the commissioners and any other appropriate city officials.

I'll be in touch with George and Chris soon to discuss schedules before next Friday's status conference. In the meantime, please do not hesitate to reach out if you need anything.

Best,
Nick

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